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April 13, 2015

VIA ECF FILING AND E-MAIL

Honorable Richard J. Sullivan
United States District Court Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2104
New York, NY 10007

Re: *In re Lehman Brothers Holdings Inc., et al.*, Nos. 15-cv-01302-US, 15-cv-01326-UA, 15-cv-01368-UA ("Antoncic"), 15-cv-01376-UA ("Boughrum"), 15-cv-01407-UA ("Andriola"), 15-cv-01431-UA, 15-cv-01700-UA

Dear Judge Sullivan:

I write pursuant to Your Honor's Individual Practice Rule 1(D) in response to the letter dated April 10, 2015 of Appellee Lehman Brothers Holdings, Inc. ("LBHI"). LBHI has sought Your Honor's permission to submit a single brief in response to the four separate opening briefs filed by Appellants on March 30, 2015 in the above appeals and also has sought an extension of the page limit of its brief by 50 pages to allow LBHI a response brief of up to 75 pages. I represent the Antoncic and Andriola Appellants in the above-referenced appeals. I am one of three counsel representing Appellants in the above appeals who have not consented to LBHI's request (of a total of five counsel). I write this letter on behalf of my clients, the Antoncic and Andriola Appellants, as well as the Boughrum Appellants represented by the firm of Rich, Michaelson, Magaliff, Moser, LLP, which Appellants also have not consented to Appellee's request.

The four separate opening 25-page briefs filed by Appellants for the most part raise substantially distinct issues. The Antoncic, Andriola and Boughrum Appellants believe that the parties and the Court would be better served by Appellee filing four separate briefs in which Appellee could make a logical presentation in responding to Appellants' arguments rather than the Court potentially being required to play archaeologist and having to shift between Appellee's arguments and the Appellants' briefs trying to figure out which Appellant has made which argument to which Appellee is responding.

If the Court prefers one consolidated brief for LBHI, Appellants believe that LBHI's proposed 75-page limit is excessive. Appellants believe a single 75-page brief would allow LBHI more pages for substantive argument than if it had filed separate briefs. LBHI has submitted that its proposal of 75 pages is 25 pages less than the 100 pages it would have been

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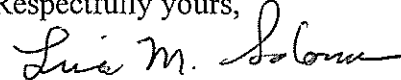
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allowed through filing four separate briefs. Appellants do not believe the proper inquiry is made by adding up each of the 25-page briefs together since the purpose of a single brief is to consolidate the legal arguments. LBHI itself has indicated its stated goal in filing a single brief of streamlining the arguments. Moreover, in a single brief Appellee would be saving approximately 10 pages of introductory material for each of the three briefs that would have been required for separate briefs, or saved space of approximately 30 pages. On that basis, we have suggested to LBHI a 50-page limit for a single response brief if one were filed, which would still allow Appellee significant flexibility in allocating many pages to a single legal argument or to equally allocate pages to the various arguments made by Appellants, a choice that LBHI would not have if it were to file separate 25-page briefs.

Thank you for your consideration.

Respectfully yours,

A handwritten signature in cursive script, appearing to read "Lisa M. Solomon".

Lisa M. Solomon

cc: Ralph I. Miller, Esq.
Eugene N. Kaplan, Esq.
Richard J. Schager, Esq.
A. James Boyajian, Esq.
Robert N. Michaelson, Esq.